IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA vs.	: :	Crim. No. 2:18-CR-101
SAMANTHA HOLLIS	: :	
	ORD	<u>ER</u>
AND NOW, on the	_ day of _	, 2021, upon consideration of
the defendant's Motion to Travel Outsi	ide of the	Eastern District of Pennsylvania, it is hereby
ORDERED that said Motion is GRAN	TED. A	ccordingly, Samantha Hollis may travel to the
Dominican Republic from July 9 thru Ju	ıly 13, 202	21.
		BY THE COURT:
		HONORABLE GENE E.K. PRATTER

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : Crim. No. 2:18-CR-101

:

SAMANTHA HOLLIS

VS.

:

DEFENDANT'S MOTION TO TRAVEL

TO THE HONORABLE GENE E.K. PRATTER, JUDGE, UNITED STATES EASTERN DISTRICT OF PENNSYLVANIA, PHILADELPHIA:

COMES NOW the defendant, Samantha Hollis, through her attorney Lawrence J. Bozzelli, Esquire, and pursuant to the Federal Bail Reform Act and Rule 18 U.S.C. §3142, to respectfully request that this Honorable Court enter an Order modifying the condition of pre-trial release such that Hollis may travel outside of the Eastern District of Pennsylvania and averts the following:

- 1) On January 18, 2019, Ms. Hollis appeared before the Hon. Timothy Rice. At that hearing, several pre-trial release conditions were established. One of the conditions limited her ability to travel outside of the United States without permission from the Court
- 2) The defendant has stated that her client has offered to take her on a business trip concerning a project they are working on in the Dominican Republic. The trip will last only from July 9th until July 13th, 2021. The business is not related to the medical field. The client is "The EZ Way Transportation Service LLC", Tharron Shehee Fleet Owner. The address of the hotel/condo is the Eden Condo, Punta Cana, La Altagracia Province, Dominican Republic.
- 3) The defendant can provide proof of the trip upon her return.
- 4) Counsel for the defendant discussed this request with AUSA Jason Bologna and he has no objection.
- 5) The defendant has been on pre-trial release for over 2 years with no violations.

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order granting the Motion to Modify the condition of pre-trial release such that Hollis can travel as requested.

Respectfully submitted,

LAWRENCE J. BOZZELLI Attorney for Samantha Hollis

CERTIFICATE OF SERVICE

I, Lawrence J. Bozzelli, attorney for Ms. Hollis, hereby certify that I have served copies of the Defendant's Motion to Travel via PACER/e-mail to (1) Jason Bologna, Assistant United States Attorney, and (2) the Honorable Gene E.K. Pratter on the below listed date.

LAWRENCE J. BOZZELLI Attorney for Samantha Hollis

DATE: <u>June 23, 2021</u>